

July 17, 2020

via eDocket

Ms. Elizabeth Rolando
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Re: Docket No. 20-0309
Illinois-American Water Company Compliance Filing
Bill Payment Assistance Program Distribution Plan
(Stipulation Paragraph 17.c)

Dear Ms. Rolando:

Pursuant to the Commission's June 18, 2020 Order in the above-referenced matter, enclosed please find a public report that identifies the manner in which Illinois-American Water Company's Bill Payment Assistance Program Amounts will be distributed to eligible customers, as required by Paragraph 17.c of the June 10, 2020 Stipulation.

Sincerely,

/s/ Anne M. Zehr

Anne M. Zehr

Enclosures

cc: Kenneth C. Jones, Vice President and General Counsel, Illinois-American Water Company (*via email, w/ encls.*)

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	
In the Matter of Moratorium on)	
Disconnection of Utility Services during)	Docket No. 20-0309
the Public Health Emergency Declared)	
on March 9, 2020 pursuant to Sections)	
4 and 7 of the Illinois Emergency)	
Management Agency Act.)	

**Illinois-American Water Company's
COVID-19 Bill Payment Assistance Program**

Program Purpose: Illinois-American Water Company's (IAWC) COVID-19 Bill Payment Assistance Program is a residential customer bill payment assistance program intended to provide eligible residential customers with relief from high arrearages incurred as a result of financial hardship caused by the COVID-19 pandemic. The primary purpose of this program is to provide a safety net to residential customers at a time when the extent of economic damage caused by COVID-19 remains unknown.

Program Administration: The program will be administered by the Salvation Army through IAWC's H2O (Help to Others) program, an existing emergency assistance program created by IAWC and Illinois' Salvation Army agencies. Bill payment assistance will be available when an eligible residential customer applies with the Salvation Army for assistance through the H2O program.

Assistance Available: Forgiveness of up to \$200 or outstanding arrearage, whichever is less, will be available to residential customers who meet the eligibility criteria described in the attached Guidelines. Eligible customers can apply for assistance from the Salvation Army, and then the Salvation Army will apply the bill payment assistance to the remaining balance, up to \$200, to the utility and, ultimately, the customer's account. If the H2O payment assistance applied eliminates all arrearages, the customer will start next month's billing with a current account. If the H2O assistance still leaves an arrearage, IAWC will work with the customer to establish a Deferred Payment Arrangement (DPA), consistent with the terms of Paragraph 8 of the June 10, 2020 Large Utility Stipulation in ICC Docket 20-0309, based on that reduced balance. In this way, the COVID-19 Bill Payment Assistance Program, will help increase the customer's likelihood of successfully completing the new DPA and reduce IAWC's uncollectible expense.

Program Funding: IAWC will provide an Initial Funding Amount to the Salvation Army of approximately \$668,000, which represents twenty-five (25%) of the authorized level of residential uncollectible expense included in the IAWC's last rate case. Ongoing quarterly or more frequent Subsequent Funding Amounts will be made, if necessary, up to an

annualized dollar amount equal to the last rate case authorized uncollectible expense amount, in order to ensure that sufficient funds are available to be used for COVID-19 Bill Payment Assistance during the subsequent quarter.

Any funding that IAWC provides to the Salvation Army for the COVID-19 Bill Payment Assistance Program in excess of the funds used to assist customers and administrative fees during the Term shall remain with the Salvation Army for use to assist customers in future periods until the funds are exhausted.

Term: The COVID-19 Bill Payment Assistance Program will continue from the date the Initial Funding Amount is provided until the COVID-19 Bill Payment Assistance Funding Amounts are exhausted.

Program Cost Recovery: COVID-19 Bill Payment Assistance Program Amounts will be recovered through the COVID-19 Special Purpose Rider, as set forth in Paragraphs 16, 17, and 19 of the Large Utility Stipulation, which will apply to the same customer classes who are eligible for the COVID-19 Bill Payment Assistance Program, specifically allocated to residential customers. Total COVID-19 Bill Payment Assistance Program Amounts recoverable through the COVID-19 Special Purpose Rider will be the Initial Funding Amount and any Subsequent Funding Amounts provided to the Salvation Army, including Program administration fees, for the COVID-19 Bill Payment Assistance Program, up to an annualized dollar amount equal to the authorized level of uncollectibles expense (residential water and wastewater service) in IAWC's last rate case, as provided above. IAWC will notify Staff and a designated representative of the Joint Consumer Parties in the event that the total of the Initial Funding Amount and any Subsequent Funding Amounts exceeds fifty percent (50%) of the authorized level of uncollectibles expense in IAWC's last rate case, and at each twenty-five percent (25%) increment thereafter up to the total funding level, and will work Staff and a designated representative of the Joint Consumer Parties to identify reporting in addition to the Monthly Credit and Collections Data Reporting and COVID-19 Related Costs Reporting required by Paragraphs 12 and 18, respectively, of the Stipulation to ensure that the COVID-19 Bill Payment Assistance Program is operating as intended.

Manner of Distribution of COVID-19 Bill Payment Assistance Funds: The COVID-19 Bill Payment Assistance Program funds will be applied as determined by the Salvation Army's criteria for assistance under the H2O program as further described in the attached Guidelines. Customers may only receive COVID-19 Bill Payment Assistance Program assistance one time during the Term. If any COVID-19 Bill Payment Assistance Program funds remain at the end of the Term, the Salvation Army will use any and all remaining funds to support the H2O assistance program until such funds are depleted.



Salvation Army Guidelines

Updated: July 2020

The purpose of the Illinois American Water H2O Help to Others program is to assist individuals and families who need assistance to pay their delinquent home water/wastewater bills. The customer assistance program is for Illinois American Water customers only. It is administered by participating Salvation Army offices throughout the state.

Program History

The H2O Help to Others program has been in existence in Illinois since October 1996, and services all Illinois American Water service areas: Alton, Interurban (Belleville, East St. Louis, Granite City), Cairo (Marion), Peoria, Pekin, Lincoln, Champaign, Sterling, Streator, Pontiac, Farmington (Peoria), Hardin (Marion and Interurban), and the Chicago Metro District (including a Joliet office).

Program Funds

The Illinois American Water H2O Help to Others program funds come from voluntary contributions by customers and payments by Illinois American Water (company). Customers may make a voluntary donation to the program on their water bills. Illinois American Water makes a quarterly payment to the Salvation Army to support the program, independent of customer donations. The participating Salvation Army offices receive a set amount of funds every quarter. Additional H2O Help to Others program funds will temporarily come from COVID-19 Bill Payment Assistance Program Amounts, which will be recovered by Illinois American Water from residential customers via a COVID-19 Special Purpose Rider, as approved by the Illinois Commerce Commission in ICC Docket 20-0309.

The Salvation Army agrees to use 95% of the grant allocation to directly provide assistance to qualified Illinois American Water customers in paying their delinquent home water-wastewater bills. Further, the Salvation Army shall apply the remaining 5% of their grant allocation to fully cover the administrative fees incurred by the Salvation Army in administering the H2O Help to Others program.

Eligibility Guidelines

Any Illinois American Water residential customer, who requests assistance from the Salvation Army, has a delinquent account and demonstrates financial need under the criteria established by the Salvation Army is eligible to participate in the H2O Help to Others program. The following guidelines govern eligibility and use of the program.

1. The individual requesting assistance through this program must be an Illinois American Water residential customer.
2. Individuals requesting assistance must provide a current copy of their delinquent water and/or wastewater bill to a Salvation Army caseworker.
3. The individual must demonstrate financial need not due to chronic or intentional delinquency. When appropriate, standard income guidelines established by the Salvation Army may be used. However, all circumstances should be considered where financial need is demonstrated. Until at least February 21, 2021, verbal expressions of financial hardship resulting from the COVID-19 pandemic shall be acceptable.
4. The Salvation Army may assist with a **maximum of \$200.00 per individual/family** on a delinquent account.
5. The Salvation Army may assist an individual/family one time per calendar year. In extreme circumstances, the agency, in coordination with a representative from Illinois American Water (Katie Fidler 217-305-5003 OR customeradvocacy@amwater.com), may authorize assistance in excess of \$200.00 or assistance to be provided more than one time per year, but not more than twice annually.
6. Illinois American Water and The Salvation Army employees are eligible for H2O Help to Others assistance as long as they meet the program's objective criteria and guidelines. In these rare cases, Illinois American Water must be contacted before a pledge is approved. A Salvation Army employee cannot review/approve his/her own pledge. It must be approved by his/her supervisor.

Process for Payments Pledges of Assistance

1. Customers who call Illinois American Water's Customer Service Center (1-800-422-2782) with requests for assistance will be referred to their local participating Salvation Army.
2. Once the Salvation Army establishes the customer's eligibility for assistance, the Salvation Army will email (preferred) or fax an Army pledge form to the Special Accounts Group at the Customer Service Center. The pledge email, fax, or phone call for immediate approval should include:
 - a. The customer's name, address and Illinois American Water account number.
 - b. The amount pledged.
 - c. The name and phone number of the Salvation Army representative authorizing the pledge.The phone number for the Special Accounts Group is 866-772-2228. The email address for the Special Accounts Group is SpecialAccts@amwater.com. The Special Accounts Team Supervisor is Angela Miller. This contact information is for Agency usage only. Customers should be directed to the 1-800-422- 2782

3. The Special Accounts Group will place a 45-day hold on the account, note the coming pledge and cancel any planned shut-off orders. The Special Accounts Group will also send an email/ fax back to the Salvation Army, confirming the receipt of the pledge.
4. If the customer's service is already shut-off (or scheduled for a same day or next day shut- off), the Salvation Army is required to call the Special Accounts Department so the customer's service can be restored quickly. Action to restore service will not occur until information (call and/or email or fax) is received from the Salvation Army. A phone call should be followed up with an email or fax. The Salvation Army should advise the customer to call the Illinois American Water toll-free number (1-800-422-2782) to schedule their water to be turned on once the Salvation Army completes the necessary steps indicated. The Customer Service Representatives will see the pledge in the customer's account. **It is extremely important that the Salvation Army makes contact with Special Accounts to prevent disconnection or to have service restored. The Salvation Army should call Special Accounts directly (and send a follow-up email or fax) if the customer is in danger of having his/her water shut off.** To restart service or cancel a service shutoff, the pledged amount (or the pledged amount plus customer payment) must be enough to cover the shut-off amount and fees. Reconnect fees can be included in the pledge amount, unless the customer was entitled to a fee waiver per the Illinois Commerce Commission's March 18, 2020 Emergency Interim Order and/or the June 20, 2020 Stipulation approved by the Illinois Commerce Commission in ICC Docket 20-0309, in which case there should not be a billed fee. Any and all fees may be otherwise waived at the discretion of Illinois American Water.

Payment Processes

1. Each quarter, Illinois American Water will make a donation, in accordance with the Agreement and to the extent required by Illinois American Water's COVID-19 Bill Payment Assistance Program as approved by the Illinois Commerce Commission as part of the June 10, 2020 Stipulation in ICC Docket 20-0309, to the Salvation Army's local office. The amount varies by Salvation Army office.
2. Every month, the Salvation Army will send one check for the pledged amounts, and a spreadsheet summarizing the account pledges to Illinois American Water's payment center, at the following address. Payments should be mailed by the 10th of the month.

Illinois American Water
P.O. Box 6029
Carol Stream, IL 60197-6029

The spreadsheet should include customer names, account numbers and dollars transferred. **A copy of the spreadsheet must be sent monthly to Illinois American Water's contact.**

Katie Fidler

Katie.Fidler@amwater.com

[Phone: 217.305.5003](tel:217.305.5003)

Administration/Reporting

At the end of the month, each participating Salvation Army office will provide a report by email to the Illinois American Water contact summarizing the number of households assisted in each service area, the number of individuals represented in these households (including a breakdown of elderly and handicapped residents and children) and the total dollars of assistance provided in each service area.

PARTICIPATING SALVATION ARMY OFFICES – Customers can visit for help.**ALTON SALVATION ARMY**

(618) 465-7765 | 525 Alby Street, Alton, IL 62002

BELLEVILLE SALVATION ARMY

(618) 235-7378 | 20 Glory Place, Belleville, IL 62226

CAIRO SALVATION ARMY

(618) 993-5854 | 906 Tower Square Plaza, Marion, IL 62959

CHAMPAIGN SALVATION ARMY

(217) 373-7832 | 2212 N. Prospect, Champaign, IL 61822

EAST ST. LOUIS SALVATION ARMY

(618) 874-3136 | 616 N. 16th Street, East St. Louis, IL 62205

GRANITE CITY SALVATION ARMY

(618) 451-7957 | 3007 E. 23rd Street, Granite City, IL 62040

LINCOLN SALVATION ARMY

(217) 732-7890 | 307 N. Kickapoo, Lincoln, IL 62656

PEORIA SALVATION ARMY

(309) 655-7220 | 401 N.E. Adams, Peoria, IL 61603

PEKIN SALVATION ARMY

(309) 346-3010 | 243 Derby Street, Pekin, IL 61554

PONTIAC SALVATION ARMY

(815) 844-5005 | 112 N. Division, Pontiac, IL 61764

STERLING SALVATION ARMY

(815) 625-1622 | 409 Avenue F, Sterling, IL 61081

STREATOR SALVATION ARMY

(815) 672-2746 | 126 S. Bloomington Street, Streator, IL 61364

CHICAGO METRO AREA**South Beloit Salvation Army**

(815) 972-1135, 416 S. Madison St., Rockford, IL 61104

Aurora Salvation Army

(630) 897-7265, 437 E. Galena Blvd., Aurora, IL 60505

Des Plaines Salvation Army

(847) 981-9111, 609 W. Dempster, Des Plaines, IL 60016

Joliet Salvation Army

(815) 726-4834, 300 3rd Ave., Joliet, IL 60433

Norridge Salvation Army

(708) 456-6220, 8354 W. Foster Ave., Norridge, IL 60706

Oakbrook Terrace Salvation Army

(630) 629-3044, 1 S. 415 Summit, Villa Park, IL 60181

Bolingbrook Salvation Army

(630) 759-1317, DuPage Township, Q41 Canterbury Lane, Bolingbrook, IL 60440

ILAW's contacts for communication/reports

District/Service area	County	Address	Phone Number
Alton	Madison County	PO Box 524 525 Alby Street Alton, IL 62002	618.465.7764
Belleville	St. Clair County	20 Glory Place Belleville, IL 62226	618.235.7378
Champaign	Champaign County	PO Box 618 2212 North Prospect Champaign, IL 61822	217.373.7832 x 23
Chicago Metro/South Beloit	Cook County	5040 N. Pulaski Road Chicago, IL 60630	773.205.3568
East St. Louis	St. Clair County	PO Box 339 616 N. 16 th Street East. St. Louis, IL 62205	618.874.3136
Granite City	Madison County	3007 E. 23 rd Street Granite City, IL 62040	618.451.7957

Lincoln	Logan County	401 NE Adams Peoria, IL 61603	309.655.7220 x 144
Cairo (Marion)	Williamson County	906 Tower Square Plaza PO Box 1112 Marion IL 62959	618.993.5854
Pekin	Tazewell County	243 Derby Street Pekin, IL 61554	309.346.3010
Peoria	Peoria County	401 NE Adams Peoria, IL 61603	309.655.7220 x 160
Pontiac	Livingston County	112 N. Division St. PO Box 529 Pontiac, IL 61764	309.655.7220 x 144
Sterling	Whiteside County	409 Avenue F, Box 336 Sterling, IL 61081	815.625.1622
Streator	LaSalle County	126 South Bloomington Streator, IL 63164	309.655.7220 x 144